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# Consultation response form: URN 14D/247

Please use the tables below as a template to respond to the consultation. It will help us to record and take account of your views. Where possible, please could you provide evidence to support your answers and comments.

**Please Return by 31July 2012 to:**

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| Consultation | | | | |
| Implementing the Aviation EU Emissions Trading System Regulation in UK Regulations | | | | |
| Please Return by 22 September 2014 | | | | |
| EU ETS Team  Department of Energy and Climate Change  Area 1A  3-8 Whitehall Place  London  SW1A 2AW  You can also submit this form by email:  [euets.consultation@decc.gsi.gov.uk](mailto:euets.consultation@decc.gsi.gov.uk) | | | | |
| Respondent from Northern Ireland, Scotland and Wales please copy responses to: | | | | |
| **Northern Ireland:**  Christopher McWilliams  Environmental Policy Division  Department of the Environment  6th Floor  Goodwood House  44-58 May Street  Belfast BT1 4NN  [chris.mcwilliams@doeni.gov.uk](mailto:chris.mcwilliams@doeni.gov.uk) | | | **Scotland:**  Climate Change Division  Scottish Government  1D South  Victoria Quay  Edinburgh EH6 6QQ  [climate.change](mailto:euets@scotland.gsi.gov.uk)@scotland.gsi.gov.uk | **Wales:**  Radioactivity and Pollution Prevention Branch  People and Environment Division  Welsh Government  Cathays Park  Cardiff, CF10 3NQ  [RRPMailbox@wales.gsi.gov.uk](mailto:RRPMailbox@wales.gsi.gov.uk) |
| Respondent Details | | | | |
| **Name** | |  | | |
| **Organisation** | |  | | |
| **Address** | |  | | |
| **Town/City** | |  | | |
| **Postcode** | |  | | |
| **Telephone** | |  | | |
| **Email** | |  | | |
| **Would you like this response to remain confidential?** | |  | | |
| **If yes please state your reason (this will help should we receive a request for information)** | |  | | |
| Consultation Question | | | | |
| 1. | Do you have any comments on the proposed amendments to the 2012 Regulations? Are there any parts of the Amending Regulations where further clarity is required? | | | |
| Response |  | | | |
| 2. | Do you believe there is an enforceable alternative method, other than what is proposed here, of implementing the EU Regulation into UK law? If so, please outline your suggested method. | | | |
| Response |  | | | |
| 3. | The Amending Regulations have amended Schedule 8 of the 2012 Regulations to substitute the reference to the “benchmarking year” (i.e. 2010) with the “second calendar year of the trading phase” (i.e. 2014), in order to correct for a previous error in the Regulations.  As far as the UK regulators are aware, operators who intend to apply to the special reserve have been monitoring tonne-kilometre data for 2014. The UK regulators also intend to accept data for 2014 when considering applications for the special reserve.  Do you think the proposed change to Schedule 8 will cause any prejudice to operators? If so, could you please provide any evidence of this? | | | |
| Response |  | | | |
| 4. | **There is a provision in the EU Regulation for Member States (including the UK) to “implement simplified procedures for non-commercial aircraft operators [emitting less than 25,000 tonnes of CO2 per year] as long as such procedures provide no less accuracy than the small emitters tool provides”.**  **At present, the regulators for UK-administered aircraft operators do not intend to introduce further simplified procedures for non-commercial air transport operators who emit less than 25,000 tonnes of CO2 per year, but the regulators will keep this under review.**  If you wish, please describe what simplified procedures the UK could put in place for non-commercial aircraft operators which would ensure no less accuracy than the small emitter’s tool provides. | | | |
| Response |  | | | |
| 5. | Are you able to provide any additional evidence relating to the impacts which the accompanying UK Impact Assessment has not taken into account? Please state these e.g. impacts on the competitiveness of your business and/or your aircraft operations, in comparison to others. (N.B. We have included some more detailed questions in the Impact Assessment itself, which can be found at Annex A) | | | |
| Response |  | | | |

Thank you for taking the time to complete this consultation.